

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MARK HIGBEE,

CASE NO. 2:18-cv-13761

Plaintiff,

JUDGE SEAN F. COX

MAG. JUDGE ANTHONY P. PATTI

V

EASTERN MICHIGAN UNIVERSITY, THE  
BOARD OF REGENTS OF EASTERN MICHIGAN  
UNIVERSITY, JAMES SMITH, JAMES CARROLL,  
WADE TORNQUIST, JOLINE DAVIS, DAVID TURNER,  
DAVID WOIKE, RHONDA LONGWORTH, MICHELLE  
CRUMM, MARY TREDER LANG, DENNIS BEAGEN,  
MICHAEL HAWKS, EUNICE JEFFRIES, MICHAEL  
MORRIS, JAMES WEBB AND ALEXANDER SIMPSON,

Defendants.

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**PLAINTIFF MARK HIGBEE'S ANSWER TO INDIVIDUAL DEFENDANTS'  
MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(B)(6)**

For the reasons set forth in the attached Brief in Support of Plaintiff's Answer to Individual Defendants' Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(B)(6), Plaintiff respectfully requests this Honorable court deny the aforestated motion.

Respectfully submitted,

/s/Glen N. Lenhoff  
GLEN N. LENHOFF (P32610)  
Law Office of Glen N. Lenhoff  
Attorney for Plaintiff  
Dated: 03/01/19

/s/Robert D. Kent-Bryant  
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Dated: 03/01/19

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